

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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LAUGHLIN KENNEL COMPANY,

Plaintiff,

v.

GATEHOUSE MEDIA INC. DBA  
WORCESTER TELEGRAM AND GAZETTE,

Defendant.

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: Civil Action No. 16-cv-10738  
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**DEFENDANT’S ASSENTED-TO MOTION TO  
ADMIT MICHAEL J. GRYGIEL *PRO HAC VICE***

Pursuant to Local Rule 83.5.3, James M. Vant, a member of this Court and a shareholder of the firm Greenberg Traurig, LLP, respectfully moves for the admission to the Bar of this Court, *pro hac vice*, of Michael J. Grygiel (“Attorney Grygiel”) as counsel for Defendant GateHouse Media, LLC (“GateHouse Media” or “Defendant,” erroneously sued as “GateHouse Media Inc.”).

In support of this Motion, counsel states as follows:

1. Greenberg Traurig, LLP has been retained to represent Defendant in the above-captioned matter.
2. Attorney Grygiel is a member in good standing of the Bars of the jurisdictions in which he is admitted to practice. No disciplinary proceedings are pending against him, nor has he been suspended or disbarred in any jurisdiction.
3. Attorney Grygiel is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
4. In accordance with Local Rule 83.5.3, a Certificate for Admission *Pro Hac Vice* of Michael J. Grygiel in support of this Motion is attached hereto as **Exhibit A**.

5. A [Proposed] Order Granting Defendant's Assented-To Motion to Admit Michael J. Grygiel *Pro Hac Vice* is attached hereto as **Exhibit B**.

WHEREFORE, Defendant respectfully requests that this Court:

- A. Allow the admission, *pro hac vice*, of Attorney Grygiel; and
- B. Grant such other and further relief as is just and proper.

Dated: April 22, 2016

Respectfully submitted,

GREENBERG TRAURIG, LLP

*/s/ James M. Vant*

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James M. Vant (BBO #653616)

One International Place

Boston, Massachusetts 02110

Tel: (617) 310-6000

Fax: (617) 310-6001

E-mail: vantj@gtlaw.com

*Attorneys for Defendant*

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), counsel for Defendant has conferred with counsel for Plaintiff in connection with this Motion, and Plaintiff's counsel has assented to this Motion.

*/s/ James M. Vant*

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James M. Vant

### **CERTIFICATE OF SERVICE**

I, James M. Vant, hereby certify that on April 22, 2016, I caused the foregoing document (and accompanying exhibits) to be electronically filed with the United States District Court for the District of Massachusetts through the CM/ECF system. I also certify that on April 22, 2016, a copy of the foregoing document (and accompanying exhibits) is being served on all counsel of record on the attached service list in the manner specified, either via transmission of the Notice of Electronic Filing ("NEF") generated by the CM/ECF system or in some other authorized manner for those counsel or parties who are indicated as non-registered participants who are not authorized to receive NEFs.

*/s/ James M. Vant*

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James M. Vant

**SERVICE LIST**

*Laughlin Kennel Co. v. GateHouse Media Inc. DBA Worcester Telegram and Gazette*

Civil Action No. 16-cv-10738

United States District Court for the District of Massachusetts

Service by U.S. Mail and by e-mail:

John L. Fink, Esq.

18 Lyman Street, Suite 208

J&N Professional Building

Westborough, Massachusetts 01581

Tel: (508) 433-0529

E-mail: JFink@WestboroLawyer.com

*Attorney for the Plaintiff*